

Exhibit

16

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF OKLAHOMA

-----  
LAZY S RANCH PROPERTIES, :  
LLC, AN OKLAHOMA LIMITED :  
LIABILITY COMPANY :  
VS. : CASE NUMBER :  
: 6:19-cv-00425-JWB  
:  
VALERO TERMINALING AND :  
DISTRIBUTION COMPANY; :  
VALERO PARTNERS OPERATING :  
CO. LLC; AND VALERO PARTNERS :  
WYNNEWOOD, LLC, :  
-----

ORAL AND VIDEOTAPED DEPOSITION OF  
SCOTT A. STOUT, PH.D., P.G.

September 27, 2022

ORAL AND VIDEOTAPED DEPOSITION OF SCOTT A. STOUT,  
PH.D., P.G., produced as a witness at the instance  
of the Plaintiff, and duly sworn, was taken in the  
above-styled and numbered cause on the 27th day of  
September, 2022, from 9:59 a.m. to 4:57 p.m., before  
FELICIA A. NEWLAND, CSR, in and for the State of the  
District of Columbia, reported by stenograph, at  
Veritext Legal Solutions, 1250 I Street, Northwest,  
Suite 35, Washington, D.C., pursuant to the Federal  
Rules of Civil Procedure and the provisions stated  
on the record or attached hereto.

Page 1

<p>1 Q What evaluation did you make specific 2 to the Lazy S Ranch as to naturally occurring 3 materials? 4 I know you cite that there's some 5 aspects of some of the soil samples in your report 6 may be naturally occurring materials. What 7 investigation did you make of the existence of 8 naturally occurring vegetative materials on the 9 Lazy S Ranch? 10 A I've seen photographs of the 11 landscape there that shows there's indeed 12 vegetation present. Irrespective of that, the 13 chemistry of the soil samples told me there's 14 remnants of that vegetation present. 15 Q Based on the GC aspect, correct? 16 A Based upon the chromatogram, the 17 GC/FIDs. 18 Q GC/FIDs. Thank you, sir, for the 19 correction. 20 Did you do any testing of the organic 21 content of these soils near the pipelines? 22 A No. I -- I didn't analyze any soils.</p> <p style="text-align: right;">Page 202</p>	<p>1 detections of individual volatile aromatic 2 hydrocarbons. All of those are J qualified -- 3 which you may want me to explain -- all in the 4 range of, you know, .25 to .08 parts per billion in 5 soil. And then off to the far right there are 1.44 6 to 3.68 part per million TPH DRO reported for those 7 soils. 8 Q Okay. 9 A Also J qualified. 10 Q And J qualified means there's a -- 11 does J qualified mean that it's below the 12 laboratory detection limit, but it's estimated by 13 the lab, the concentration? 14 A It -- no. 15 Q Okay. What does it mean? 16 A It means the concentration was below 17 the laboratory sample-specific reporting limit -- 18 Q Reporting limit? 19 A -- but above the method detection 20 limit. 21 Q Thank you. 22 And on Figure 3, that you mentioned</p> <p style="text-align: right;">Page 204</p>
<p>1 They were all collected by Dr. Fisher and analyzed 2 at his laboratory. 3 Q Was any -- 4 A I'm sorry, that's not true. I mean, 5 there were the three samples that -- from the -- 6 Q Right. 7 A -- January 2022 excavation. 8 Q I was -- I was just going to ask you 9 about that. There were a couple of soil samples? 10 A Yes. 11 Q And those are found on Table 3, 12 correct? 13 A Yes. And their chromatograms, are 14 all found on Figure 3. 15 Q Figure 3. 16 And just looking at Table 3, these 17 results show that there was some, what, that Alpha 18 Labs collected from the -- what would you call that 19 that was shown there that was present in the 20 conventional soil that was collected by the 21 defendant? 22 A There are, you can see, four</p> <p style="text-align: right;">Page 203</p>	<p>1 earlier, these are the GCs for those -- that 2 sample? 3 A For each of those three samples, yes. 4 Q Okay. And what -- what is your 5 interpretation of these? 6 A They each contained predominantly 7 biogenic chemicals, which is this naturally 8 occurring organic matter we started this 9 conversation about. 10 Q Yes, sir. 11 A And the basis for that is they 12 exhibit the characteristic, quote, classic 13 fingerprint of biogenic materials, well published. 14 Sample two -- 15 Q What does it mean that they're within 16 the range of diesel range biogenic chemicals? 17 What does it mean that they're -- I 18 mean, I see it on this Figure 3, you have, "Diesel 19 range biogenic chemicals," and then, "residual 20 range biogenics." What's the distinction between 21 those two, if there is one? 22 A It's only referring to chemicals that</p> <p style="text-align: right;">Page 205</p>


<p>1 boil below C28, the upper limit of DRO or above 2 that limit. And I explained this in the background 3 material in my report that, you know, TPH is a 4 manmade metric, and we divide that metric into 5 different carbon ranges that we refer to as 6 gasoline range or diesel range or residual range, 7 but there are other things, for example, natural 8 organic matter that can occur within each of those 9 ranges that has nothing to do with petroleum, but 10 it's falsely measured as petroleum when it occurs 11 in the diesel range or the residual range. And 12 that's what's happening here with this natural 13 organic matter.</p> <p>14 Q Okay. On the -- on the B sample, 15 there's a -- there's a reference to 20. What does 16 that refer to?</p> <p>17 A That refers to an alkane, again, a 18 straight chain hydrocarbon with 20 carbons in a 19 row.</p> <p>20 Q Is that part of the biogenic 21 naturally occurring materials or is it different 22 from that?</p> <p style="text-align: right;">Page 206</p>	<p>1 based on what your report says here, on the 2 chemical fingerprint for B, it could be either 3 diesel range or the coating for the pipeline. Is 4 that your testimony?</p> <p>5 A No.</p> <p>6 Q What's your testimony?</p> <p>7 A It's not diesel fuel and possibly the 8 coating.</p> <p>9 Q And if it's not any of those, what is 10 it?</p> <p>11 A I don't know. And the reason I say 12 possibly the coating is because exactly, as your 13 question a few moments ago, I did not analyze it, 14 but its description by the manufacturer indicates 15 it contains waxes, which is what we see here.</p> <p>16 Q Did you ask Valero for a sample of 17 the coating materials so you could do an analysis?</p> <p>18 A I don't believe we did -- I did 19 suggest that. Again, this wasn't evident until 20 after these soils had been collected and the hole 21 closed up in January of 2020 -- 2022 rather. So no 22 additional work went back to expose the pipeline</p> <p style="text-align: right;">Page 208</p>
<p>1 A It's different. And it's, I think, 2 explained either on the bottom of the page or 3 certainly in the text.</p> <p>4 Q Would you explain for the jury here 5 today, sir?</p> <p>6 A I'm just reading the bottom of page 7 40 right now where I say, "The trace n-alkanes in B 8 within the DRO range are not accompanied by a UCM 9 which could indicate diesel fuel, but rather appear 10 to be waxes possibly attributable to the pipelines 11 coating material; see text." Because I know I've 12 got a longer explanation earlier in the report.</p> <p>13 Q Okay. The coating material, did you 14 do any analysis of Valero's coating material on 15 this pipeline?</p> <p>16 A No, I did no chemical analysis.</p> <p>17 Q That's what I mean.</p> <p>18 A Just a literature analysis.</p> <p>19 Q A literature analysis. You did no 20 chemical analysis?</p> <p>21 A That's right.</p> <p>22 Q So you're attributing -- so I guess</p> <p style="text-align: right;">Page 207</p>	<p>1 and collect this.</p> <p>2 Q So the answer is you didn't ask for a 3 sample of the original pipeline coating, correct?</p> <p>4 A No. At the time when I got these 5 results and initiated my investigation as to what 6 it could be, the literature on the pipeline coating 7 material explained its potential source 8 satisfactorily to me.</p> <p>9 Q Did it have a -- an analysis similar 10 to what's on the -- these tables in your report or 11 your GC graph example that you could compare it to?</p> <p>12 A No. It didn't provide that level of 13 detail. The descriptions of these Polyken coating 14 material, the tapes that were used, is found in one 15 of my footnotes or in the text on pages 14 and 15.</p> <p>16 Q So the answer is, is that you didn't 17 have a similar detail for this commercial product 18 description, you didn't have either an analytical 19 result or GC/FID sample for this material, correct?</p> <p>20 A No, I didn't. As I said, the 21 literature descriptions of their chemical 22 compositions answered my question satisfactorily,</p> <p style="text-align: right;">Page 209</p>

<p>1 you, that this phenomena is known to occur in karst</p> <p>2 settings.</p> <p>3 Q But we don't know if it's occurring</p> <p>4 in this particular setting or not, correct?</p> <p>5 A There's no reason to believe that</p> <p>6 it's not given the long-term manifestation of the</p> <p>7 conditions.</p> <p>8 Q It could be a long-term leaking</p> <p>9 pipeline, couldn't it, Doctor?</p> <p>10 MR. JOHNSON: Objection. Form.</p> <p>11 THE WITNESS: There's no evidence for</p> <p>12 a long-term leaking pipeline, particularly the</p> <p>13 Valero pipeline, which has been investigated.</p> <p>14 There's no data available. The data collected at</p> <p>15 15 excavations along the Valero pipeline show no</p> <p>16 evidence of petroleum released. If there had been,</p> <p>17 it would be evident.</p> <p>18 BY MR. PAGE:</p> <p>19 Q How much of the pipeline has not been</p> <p>20 investigated?</p> <p>21 A I don't know. Some fraction of it.</p> <p>22 Q And how much of the pipeline overlays</p> <p style="text-align: right;">Page 222</p>	<p>1 Q Okay. And it's about how much of the</p> <p>2 pipeline and how long of the pipeline traverses the</p> <p>3 ranch?</p> <p>4 Three miles sound right?</p> <p>5 A I don't recall a number. I do my --</p> <p>6 look at my scale on my diagram here and estimate it</p> <p>7 but --</p> <p>8 Q Well, Doctor, you used the term, you</p> <p>9 said that the pipeline has been evaluated, but you</p> <p>10 didn't see any -- any leaks or spills. I'm just</p> <p>11 trying to get you to quantify how much of this</p> <p>12 pipeline over the karst has actually been evaluated</p> <p>13 by Valero.</p> <p>14 We've had 15 digs, you said. How</p> <p>15 much is actually exposed in each dig? How many</p> <p>16 feet?</p> <p>17 A Tens.</p> <p>18 Q Tens of feet.</p> <p>19 And if we had two miles of pipeline,</p> <p>20 do you think that's a reasonable representation of</p> <p>21 the -- the -- the -- the pipeline's potential to</p> <p>22 leak on the Lazy S Ranch?</p> <p style="text-align: right;">Page 224</p>
<p>1 the karst terrane at the Lazy S Ranch?</p> <p>2 A Of the entire pipeline or --</p> <p>3 Q Of the pipeline that's on the Lazy S</p> <p>4 Ranch, how much of it covers karst?</p> <p>5 Did you investigate that?</p> <p>6 A I was just looking at a figure that</p> <p>7 allowed me to, because it's my --</p> <p>8 Q But I asked you prior to today, just</p> <p>9 right now, sitting in this deposition, did you</p> <p>10 investigate that -- how much of the karst is -- how</p> <p>11 much of the pipeline runs over the karst on the</p> <p>12 Lazy S Ranch?</p> <p>13 MR. JOHNSON: Objection. Form.</p> <p>14 Go ahead.</p> <p>15 THE WITNESS: I didn't investigate</p> <p>16 it, I had it available to me.</p> <p>17 BY MR. PAGE:</p> <p>18 Q Okay. Well, did you evaluate how</p> <p>19 much of the pipeline overlays the karst?</p> <p>20 A I didn't see a reason to evaluate it.</p> <p>21 I can look at it and see it's somewhere around</p> <p>22 70 percent.</p> <p style="text-align: right;">Page 223</p>	<p>1 MR. JOHNSON: Objection. Form.</p> <p>2 THE WITNESS: Those excavations were</p> <p>3 conducted at areas where other data indicated</p> <p>4 certain anomalies existed, anomalies potentially</p> <p>5 associated with thinning of the walls and so forth.</p> <p>6 So it's, I think, common practice and due diligence</p> <p>7 to investigate those areas, which is what Valero</p> <p>8 did. And the data collected in the soils around</p> <p>9 those are clean.</p> <p>10 BY MR. PAGE:</p> <p>11 Q They're clean?</p> <p>12 A Oh, yes.</p> <p>13 Q What do you mean by clean?</p> <p>14 A It's explained in my report.</p> <p>15 Q There's no refined products in</p> <p>16 that --</p> <p>17 A That's correct.</p> <p>18 Q -- in that soil?</p> <p>19 A There's naturally occurring organic</p> <p>20 matter that's falsely measured as TPH DRO. There's</p> <p>21 laboratory contamination from Accurate Laboratories</p> <p>22 falsely measured as TPH DRO, but there's no</p> <p style="text-align: right;">Page 225</p>

<p>1 petroleum present.</p> <p>2 I'm sorry, I wanted to add the third</p> <p>3 one. In the samples that were analyzed by me at</p> <p>4 Alpha, there's also evidence, what I believe, is</p> <p>5 possibly attributable to the Polyken coating</p> <p>6 material on the pipeline, only visible in the more</p> <p>7 higher resolution results obtained at Alpha.</p> <p>8 Q So you've done some pipeline</p> <p>9 engineering work in the past?</p> <p>10 A No. I've been involved in pipeline</p> <p>11 investigations in the past.</p> <p>12 Q Have you ever found one that's</p> <p>13 leaked?</p> <p>14 A Oh, yeah. That -- I'm glad you asked</p> <p>15 that. Because pipelines aren't investigated by</p> <p>16 someone like me unless there's been a leak, in</p> <p>17 which case, we see thousands or tens of thousands</p> <p>18 or even hundreds of thousands of parts per million</p> <p>19 petroleum in soils around those leaks.</p> <p>20 Q And you've investigated a leak in a</p> <p>21 karst environment --</p> <p>22 A I have --</p> <p style="text-align: right;">Page 226</p>	<p>1 Go ahead.</p> <p>2 THE WITNESS: It doesn't change the</p> <p>3 data that I have available to me.</p> <p>4 BY MR. PAGE:</p> <p>5 Q And you didn't have all the data,</p> <p>6 Doctor?</p> <p>7 MR. JOHNSON: Objection. Form.</p> <p>8 BY MR. PAGE:</p> <p>9 Q Did you --</p> <p>10 A Well, let's talk about --</p> <p>11 Q Did you --</p> <p>12 A -- the data --</p> <p>13 Q Did you --</p> <p>14 A I'm not going to evaluate pipeline</p> <p>15 integrity data. That's not my area of expertise.</p> <p>16 I'm evaluating chemical data of soils collected</p> <p>17 along that pipeline, 48 soils collected along that</p> <p>18 pipeline, 30 of which were completely clean with</p> <p>19 non-detectable hydrocarbons, 18 of which contained</p> <p>20 part per million -- tens a part per million, 15</p> <p>21 part per million at most, concentrations of TPH DRO</p> <p>22 that included natural organic matter, waxy</p> <p style="text-align: right;">Page 228</p>
<p>1 Q -- a pipeline leak?</p> <p>2 A I have not investigated a leak in a</p> <p>3 karst environment. So while it's true there's 15</p> <p>4 excavations that are clean, in your hypothesis, or</p> <p>5 the plaintiff's hypothesis, or the plaintiff's</p> <p>6 expert's hypothesis, "Well, it leaked somewhere</p> <p>7 else." That's irrefutable.</p> <p>8 I mean, of course, unless they dig up</p> <p>9 the entire pipeline, you're going to point to that.</p> <p>10 But as a scientist, I rely upon the data. The data</p> <p>11 showed no releases. The data showed no impacts to</p> <p>12 water between the pipeline and Tulip Springs, so</p> <p>13 the scenario that's being proposed is just not</p> <p>14 supported by data.</p> <p>15 Q Okay. Do you know whether or not</p> <p>16 Valero's replaced the pipeline -- all of the</p> <p>17 pipeline from the refinery to the southern border</p> <p>18 of the Lazy S Ranch?</p> <p>19 A No, I do not know.</p> <p>20 Q Okay. If I told you that was true,</p> <p>21 would that affect your analysis?</p> <p>22 MR. JOHNSON: Objection. Form.</p> <p style="text-align: right;">Page 227</p>	<p>1 contamination from the laboratory and possibly</p> <p>2 coating material from the pipeline.</p> <p>3 Q But no diesel?</p> <p>4 A No diesel, no gasoline.</p> <p>5 Q Okay. And what about the -- the --</p> <p>6 the samples that were taken from the wells that</p> <p>7 were drilled, did you look at those?</p> <p>8 A Absolutely.</p> <p>9 Q And they didn't contain any refined</p> <p>10 products?</p> <p>11 A No.</p> <p>12 Q Not at all?</p> <p>13 A No.</p> <p>14 It's all explained in my report, and</p> <p>15 I hope we -- if you want to talk about the water</p> <p>16 samples that were collected from wells and other</p> <p>17 springs on the property.</p> <p>18 Q That's all you -- that's all</p> <p>19 naturally occurring, correct?</p> <p>20 A No.</p> <p>21 Q Or unconventional sampling methods?</p> <p>22 A The nonconventional samples,</p> <p style="text-align: right;">Page 229</p>

<p>1 your analysis. Is that right?</p> <p>2 A I didn't list them in my list of soil</p> <p>3 data available to me, no.</p> <p>4 Q What were the results -- I think you</p> <p>5 testified about this this morning, but I want to</p> <p>6 make sure it's clear. What were the results of</p> <p>7 those tests?</p> <p>8 A I think I mentioned or testified</p> <p>9 earlier, they were all NDs.</p> <p>10 Q "ND" meaning?</p> <p>11 A ND being non-detect for the BTEX and</p> <p>12 TPH analysis they were analyzed for.</p> <p>13 Q If somebody were looking at whether</p> <p>14 or not those kinds of tests met regulatory</p> <p>15 thresholds, could they be useful in your view?</p> <p>16 MR. PAGE: Object to the form. This</p> <p>17 goes beyond the scope of anything I did on direct.</p> <p>18 MR. JOHNSON: It's cross-examination</p> <p>19 about his expert report, they're in his report.</p> <p>20 You can move to exclude it.</p> <p>21 BY MR. JOHNSON:</p> <p>22 Q Go ahead.</p> <p style="text-align: right;">Page 242</p>	<p>1 that was the reason about those detection limits</p> <p>2 that were reported there.</p> <p>3 So I think in that sense, if -- if</p> <p>4 those are indeed regulatory thresholds and those</p> <p>5 data showed entirely non-detect samples, then, of</p> <p>6 course, they're useful in some regard in that none</p> <p>7 of these soils exceeded regulatory threshold.</p> <p>8 Q I want to ask you now about the</p> <p>9 testing results that did report back with</p> <p>10 quantifiable amounts. Let's go to your Table 3.</p> <p>11 There are -- let's look at the soil tests where the</p> <p>12 DRO reports are.</p> <p>13 Can you just give us an example, in</p> <p>14 your experience as a chemist as to what sort of</p> <p>15 volumes we're talking about?</p> <p>16 I mean how do I picture the results</p> <p>17 that we're seeing here?</p> <p>18 MR. PAGE: Object to the form.</p> <p>19 THE WITNESS: Well, these detectable</p> <p>20 levels of TPH DRO, which looking at the range from</p> <p>21 somewhere around 5 parts per million to 15 parts</p> <p>22 per million in 18 of the 48 samples, the other 30</p> <p style="text-align: right;">Page 244</p>
<p>1 MR. PAGE: Regulatory statements are</p> <p>2 in his report?</p> <p>3 MR. JOHNSON: I'm talking about the</p> <p>4 tests that you asked him about.</p> <p>5 BY MR. JOHNSON:</p> <p>6 Q But go ahead.</p> <p>7 A I think, you know, they weren't</p> <p>8 useful to me because I was tasked in looking at</p> <p>9 what contamination was present in the soils.</p> <p>10 Because of the elevated detection limits, the</p> <p>11 higher detection limits that Environmental Testing</p> <p>12 Laboratory used versus those of Accurate</p> <p>13 Environmental Lab, for which there were splits, the</p> <p>14 results from the Accurate Lab were more useful to</p> <p>15 me because they had lower detection limits, I could</p> <p>16 see if anything was truly there.</p> <p>17 The Environmental Testing dataset, on</p> <p>18 the same set of samples, with the higher detection</p> <p>19 limits were not useful to me because they didn't</p> <p>20 inform on that. But your question about, might</p> <p>21 they be useful to somebody? Sure. I don't know</p> <p>22 about regulatory thresholds, so I didn't know if</p> <p style="text-align: right;">Page 243</p>	<p>1 being non-detects. So 5 to 15 PPM is an extremely</p> <p>2 low concentration of something being measured as</p> <p>3 TPH. It's certainly not a concentration I would</p> <p>4 attribute to petroleum-impacted soil from a</p> <p>5 pipeline release, which I think I mentioned a few</p> <p>6 moments ago would be hundreds, thousands, tens of</p> <p>7 thousands, even hundreds of thousands of PPM.</p> <p>8 That's what I've seen at other pipeline</p> <p>9 investigations that I've worked on.</p> <p>10 These levels are just completely</p> <p>11 consistent with what I've seen in them; namely</p> <p>12 natural organic matter and waxy contamination</p> <p>13 from the laboratory or possibly the pipeline</p> <p>14 coating materials, but not petroleum.</p> <p>15 BY MR. JOHNSON:</p> <p>16 Q Last question. If I told you that I</p> <p>17 went from Wheeler, Trigg, O'Donnell to Dowd Benett</p> <p>18 in 2018, would that impact your testimony at all</p> <p>19 about me being at Dowd Bennett when we worked on</p> <p>20 the 2012 or '13 Colorado UST case?</p> <p>21 A Yes, of course.</p> <p>22 Q Do you remember that at all or --</p> <p style="text-align: right;">Page 245</p>



<p>1 CERTIFICATE OF NOTARY PUBLIC</p> <p>2 I, FELICIA A. NEWLAND, CSR, the officer before</p> <p>3 whom the foregoing videotaped deposition was taken,</p> <p>4 do hereby certify that the witness whose testimony</p> <p>5 appears in the foregoing deposition was duly sworn</p> <p>6 by me; that the testimony of said witness was taken</p> <p>7 by me in stenotype and thereafter reduced to</p> <p>8 typewriting under my direction; that said deposition</p> <p>9 is a true record of the testimony given by said</p> <p>10 witness; that I am neither counsel for, related to,</p> <p>11 nor employed by any of the parties to the action in</p> <p>12 which this deposition was taken; and, further, that</p> <p>13 I am not a relative or employee of any counsel or</p> <p>14 attorney employed by the parties hereto, nor</p> <p>15 financially or otherwise interested in the outcome</p> <p>16 of this action.</p> <p>17</p> <p>18</p> <p>19 </p> <p>20 FELICIA A. NEWLAND, CSR</p> <p>21 Notary Public</p> <p>22 My commission expires:</p> <p>September 15, 2024</p> <p style="text-align: right;">Page 254</p>	<p>1 Lazy S Ranch Properties, LLC v. Valero Energy Corporation</p> <p>2 Scott A Stout , Ph.D., P.G. (#5352742)</p> <p>3 E R R A T A S H E E T</p> <p>4 PAGE____ LINE____ CHANGE_____</p> <p>5 _____</p> <p>6 REASON_____</p> <p>7 PAGE____ LINE____ CHANGE_____</p> <p>8 _____</p> <p>9 REASON_____</p> <p>10 PAGE____ LINE____ CHANGE_____</p> <p>11 _____</p> <p>12 REASON_____</p> <p>13 PAGE____ LINE____ CHANGE_____</p> <p>14 _____</p> <p>15 REASON_____</p> <p>16 PAGE____ LINE____ CHANGE_____</p> <p>17 _____</p> <p>18 REASON_____</p> <p>19 _____</p> <p>20 _____</p> <p>21 Scott A Stout , Ph.D., P.G. Date _____</p> <p>22 _____</p> <p style="text-align: right;">Page 256</p>
<p>1 ACKNOWLEDGEMENT OF</p> <p>2 DEPONENT</p> <p>3</p> <p>4 I, SCOTT A. STOUT, Ph.D., P.G., do hereby</p> <p>5 acknowledge I have read and examined the foregoing</p> <p>6 pages of testimony, and the same is a true, correct</p> <p>7 and complete transcription of the testimony given by</p> <p>8 me, and any changes or corrections, if any, appear</p> <p>9 in the attached errata sheet signed by me.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15 _____</p> <p>16 Date SCOTT A. STOUT, Ph.D.,</p> <p>17 P.G.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p style="text-align: right;">Page 255</p>	<p>1 Matthew E. Johnson</p> <p>2 mjohnson@dowdbennett.com</p> <p>3 October 12, 2022</p> <p>4 RE: Lazy S Ranch Properties, LLC v. Valero Energy</p> <p>5 Corporation</p> <p>6 9/27/2022, Scott A Stout , Ph.D., P.G. (#5352742)</p> <p>7 The above-referenced transcript is available for</p> <p>8 review.</p> <p>9 Within the applicable timeframe, the witness should</p> <p>10 read the testimony to verify its accuracy. If there are</p> <p>11 any changes, the witness should note those with the</p> <p>12 reason, on the attached Errata Sheet.</p> <p>13 The witness should sign the Acknowledgment of</p> <p>14 Deponent and Errata and return to the deposing attorney.</p> <p>15 Copies should be sent to all counsel, and to Veritext at</p> <p>16 errata-tx@veritext.com.</p> <p>17 Return completed errata within 30 days from</p> <p>18 receipt of testimony.</p> <p>19 If the witness fails to do so within the time</p> <p>20 allotted, the transcript may be used as if signed.</p> <p>21</p> <p>22 Yours,</p> <p>Veritext Legal Solutions</p> <p style="text-align: right;">Page 257</p>

Oklahoma  
Rule 12-3230  
Depositions Upon Oral Examination

F. Review By Witness; Changes; Signing.

The deponent shall have the opportunity to review the transcript of the deposition unless such examination and reading are waived by the deponent and by the parties. After being notified by the officer that the transcript is available, the deponent shall have thirty (30) days in which to review it and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph 1 of subsection G of this section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.



VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).